

December 28, 2001

Dear Chairman Powell,

As a sovereign tribal nation we acknowledge our government-to-government relationship with the Federal Communications Commission and appreciate that the FCC's efforts to ensure that Indian Tribes have adequate access to communications services. We cannot emphasize enough the importance of modern communications to the full development of strong and healthy Tribal communities.

As part of the rulemaking process we are submitting the following comments on Docket No. 96-45 - Review of Lifeline and Link-Up Service for All Low-Income Consumers.

Estimates are that 70% of Umatilla Tribal members have telephone service, well below the national average of 94%. We have only learned about the Lifeline and Link-up services in summer 2001, although we note that these programs have been available to Reservations in June 2000. We have been actively marketing the program since this past summer, but have been unable to learn from our telephone provider just how many Tribal members have been approved for Lifeline and Link-up Service. We believe that an expansion of Lifeline marketing will result in significant improvements in telephone access on the Reservation.

1. In order to be effective, our primary concerns are that the program be better advertised. Our local telephone service provider has not marketed the program actively in our area. Our Tribal members only found out about the program from other reservations and from the Housing Authority once we found out about it. We know that there has been a lot of interest from Tribal members who have learned about the program, but we do not know how many have been approved for the service. We know that few of the low-income Tribal members of the Reservation who don't live in Housing Authority units know about the program.

We encourage the Joint Board to recognize that this program is very valuable to Tribal communities; and that we have not been had the program long enough on our Reservation to know where the barriers are to participation. We need a longer period of better marketing and follow-up with applicants before we can comment on specific requirements that may be preventing low-income Tribal members for participating.

In general, we recommend marketing the program through existing, effective channels including outreach from Tribal staff; handbills distributed to Housing Authority tenants; and advertisements in the nationally-distributed Tribal newspaper, Confederated Umatilla Journal.

1. We recommend streamlining the application process. Currently, the Housing Authority certifies the income eligibility of all-clients on an annual basis. The Housing Authority would consider providing staff time to provide certification for the Lifeline and Link-up Service in order to reduce the paperwork burden on low-income tenants, if that option were allowed.

2. We urge you to expand funding for the program to allow for improved marketing both within the Housing Authority tenants and throughout the Reservation. While the telephone companies should support our marketing

efforts, we do not believe they should wholly assume them. We know that the most effective marketing can be done through Tribal government partnerships that have established relationships with low-income clients.

We recommend an annual marketing subsidy to each Tribe to support the work of our staff in marketing this program to Tribal members. This support will allow our staff to work with low-income clients who are currently not aware of their eligibility for the program, and to assist them in the application process. The Tribal members who need this service are not familiar or comfortable with paperwork in general and with disclosing personal financial information in particular.

3. If the Joint Board is considering mandating state-level criteria for eligibility, we urge the Board to remember the sovereign status of Tribes. We would prefer that eligibility for Tribal members remain as broad as possible. We recommend that eligibility be simply "Tribal members who meet the below 80% of median income test" as required for HUD-funded housing.

4. We believe that individuals should be able to qualify for Lifeline/Link-Up support merely by being eligible for low-income assistance, whether or not they are actually enrolled in it. Eligibility should be verified by the assistance program office; in our case, by the Tribal Housing Authority.

5. Since many Tribal members' lives remain chaotic even as they enter the ranks of the (working) poor, we strongly recommend Lifeline enrollment be extended for a specified minimum period of time rather than cut off as soon as income goes up. Telephone service is often required to find and keep employment, and we believe that this assistance should be continued during the challenging first few months of increased income due to employment.

6. Finally, we strongly urge you to help us find a solution for the low-income elders who cannot afford basic phone service even with these programs. We have been actively installing the Lifeline service within Housing Authority homes, but find that too many frail and homebound elders who would benefit from this service cannot even afford the prerequisite telephone.

We are strong supporters of regional solutions and have watched with interest as the Affiliated Tribes of the Northwest Indians (ATNI) have developed a project to provide regional telephone and telecommunications technical assistance to tribes in Washington State. Due to restrictions from the source of funds, this assistance is not available outside of Washington, but we believe that the approach is a very promising one that could provide significant advantages to tribes throughout the country. We urge you to consider this solution and to help us find funds to expand it, perhaps from telecommunication company foundations and/ or from Universal Service Funds.

On behalf of the tribal community I thank you for the opportunity to bring our voices to this process. Please contact me if you have any questions.

Sincerely,

CONFEDERATED TRIBES OF THE  
UMATILLA INDIAN RESERVATION

J. David Tovey, Executive Director

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